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**2022-CC09988 - TINA POYNTER-ABELL V. 3M COMPANY, ET. AL. (E-CASE)**

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**10/22/2020** ☐ [Summ Req-Circuit Pers Serv](#)

Affidavit of Service on 3M Company.

**Filed By:** ANDREW KELLEY SMITH

**On Behalf Of:** TINA POYNTER-ABELL

☐ [Notice of Service](#)

Affidavit of Service for Dynax Corporation.

**Filed By:** ANDREW KELLEY SMITH

**10/19/2020** ☐ [Jury Trial Scheduled](#)
**Scheduled For:** 08/02/2021; 9:00 AM ; REX M BURLISON; City of St. Louis

**10/14/2020** ☐ [Notice of Service](#)

Affidavit of Service on Corteva; Electronic Filing Certificate of Service.

**Filed By:** JONATHAN MESLE SOPER

**On Behalf Of:** TINA POYNTER-ABELL

☐ [Notice of Service](#)

Affidavit of Service on El Dupont De Nemours; Electronic Filing Certificate of Service.

**Filed By:** JONATHAN MESLE SOPER

☐ [Notice of Service](#)

Affidavit of Service on The Chemours Company; Electronic Filing Certificate of Service.

☐ [Notice of Service](#)

Affidavit of Service on Raytheon; Electronic Filing Certificate of Service.

**Filed By:** JONATHAN MESLE SOPER

☐ [Notice of Service](#)

Affidavit of Service on UTC Fire Security; Electronic Filing Certificate of Service.

**Filed By:** JONATHAN MESLE SOPER

☐ [Notice of Service](#)

Affidavit of Service on Tyco; Electronic Filing Certificate of Service.

**Filed By:** JONATHAN MESLE SOPER

☐ [Corporation Served](#)

Document ID - 20-SMCC-14242; Served To - TYCO FIRE PRODUCTS L.P.; Server - ; Served Date - 01-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - BONNIE LOVE

☐ [Corporation Served](#)

Document ID - 20-SMCC-14243; Served To - UTC FIRE AND SECURITY AMERICAS CORPORATION INC; Server - ; Served Date - 01-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department;

Reason Description - Served; Service Text - BONNIE LOVE

☐ **Corporation Served**

Document ID - 20-SMCC-14239; Served To - RAYTHEON TECHNOLOGIES CORPORATION; Server - ; Served Date - 01-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - BONNIE LOVE

☐ **Corporation Served**

Document ID - 20-SMCC-14241; Served To - THE CHEMOURS COMPANY FC, LLC; Server - ; Served Date - 11-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - BONNIE LOVE

☐ **Corporation Served**

Document ID - 20-SMCC-14237; Served To - E I DUPONT DE NEMOURS INC; Server - ; Served Date - 03-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - BONNIE LOVE

☐ **Corporation Served**

Document ID - 20-SMCC-14236; Served To - CORTEVA, INC.; Server - ; Served Date - 02-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - BONNIE LOVE

10/06/2020 ☐ [Summ Req-Circuit Pers Serv](#)

Affidavit of Service on Leo M Ellebracht Company.

**Filed By:** ANDREW KELLEY SMITH

**On Behalf Of:** TINA POYNTER-ABELL

☐ [Summ Req-Circuit Pers Serv](#)

Affidavit of Service on Sentinel Emergency Solutions.

**Filed By:** ANDREW KELLEY SMITH

09/30/2020 ☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3810, for CHUBB FIRE, LIMITED/ CHUBB FIRE & SECURITY LIMITED.

☐ **Note to Clerk eFiling**

**Filed By:** ANDREW KELLEY SMITH

☐ [Summ Req-Circuit Pers Serv](#)

Non-Est Summons.

**Filed By:** ANDREW KELLEY SMITH

**On Behalf Of:** TINA POYNTER-ABELL

09/28/2020 ☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3742, for NATIONAL FOAM, INC..

☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3741, for DYNAX CORPORATION.

☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3740, for DU PONT DE NEMOURS, INC.

☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3739, for CHUBB FIRE, LTD/ CHUBB FIRE & SECURITY LTD.

☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3738, for CHEMGUARD, INC..

☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-3737, for BUCKEYE FIRE EQUIPMENT COMPANY.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14243, for UTC FIRE AND SECURITY AMERICAS CORPORATION INC.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14242, for TYCO FIRE PRODUCTS L.P..

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14241, for THE CHEMOURS COMPANY FC, LLC.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14240, for SENTINEL EMERGENCY SOLUTIONS, LLC.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14239, for RAYTHEON TECHNOLOGIES CORPORATION.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14238, for LEO M. ELLEBRACHT COMPANY.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14237, for E I DUPONT DE NEMOURS INC.

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14236, for CORTEVA, INC..

☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-14235, for 3M COMPANY.

☐ **Corporation Served**

Document ID - 20-SMCC-14235; Served To - 3M COMPANY; Server - ; Served Date - 02-OCT-20;  
Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

**09/25/2020**☐ **Note to Clerk eFiling**

**Filed By:** ANDREW KELLEY SMITH

☐ [Request Filed](#)

Motion for Private Process Server.

**Filed By:** ANDREW KELLEY SMITH

**On Behalf Of:** TINA POYNTER-ABELL

**09/24/2020**☐ **Filing Info Sheet eFiling**

**Filed By:** ANDREW KELLEY SMITH

☐ **Note to Clerk eFiling**

**Filed By:** ANDREW KELLEY SMITH

☐ [Pet Filed in Circuit Ct](#)

Abell Petition.

**Filed By:** ANDREW KELLEY SMITH

**On Behalf Of:** TINA POYNTER-ABELL

☐ **Judge Assigned**

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

**TINA POYNTER-ABELL, AS SPOUSE** )  
**OF AND ON BEHALF OF DECEDENT** )  
**ROBERT ABELL** )  
6328 Tholozan Ave. )  
St. Louis, MO 63109 )

**Case No.:**

**Plaintiff,**

**Division:**

**v.**

**3M COMPANY f/k/a MINNESOTA** )  
**MINING AND MANUFACTURING** )

**JURY TRIAL DEMANDED**

Serve: )

Registered Agent )  
CSC-Lawyers Incorporating Services )  
Company )  
221 Bolivar Street )  
Jefferson City, Missouri 65101 )

**and**

**BUCKEYE FIRE EQUIPMENT** )  
**COMPANY** )

Serve: )

Registered Agent )  
A Haon Corporate Agent, Inc. )  
29225 Chagrin Blvd., Ste. 350 )  
Pepper Pike, OH 44122 )

**and**

**CHEMGUARD, INC.**

Serve: )

Registered Agent )  
CT Corporation System )  
1999 Bryan Street, Ste. 900 )  
Dallas, Texas 75201 )

**and**

**CHUBB FIRE, LTD./CHUBB FIRE &** )  
**SECURITY LTD./CHUBB SECURITY,** )

**PLC/RED HAWK FIRE & SECURITY, )  
LLC, and/or CHUBB NATIONAL )  
FOAM, INC. )**

Littleton Road, Ashford, Middlesex, )  
United Kingdom TW15 1TZ )

**and )**

**CORTEVA, INC., )**

Serve: )

Registered Agent )

CT Corporation System )

120 South Central Avenue )

Clayton, Missouri, 63105 )

**and )**

**DU PONT DE NEMOURS INC. (f/k/a )**

*DOWDUPONT INC.*) )

Serve: )

Registered Agent )

The Corporation Trust Company )

1209 Orange Street )

Wilmington, DE 19801 )

**and )**

**DYNAX CORPORATION )**

Serve: )

Registered Agent )

Corporate Systems, LLC )

3500 S. Dupont Highway )

Dover, Delaware 19901 )

**and )**

**E.I. DU PONT DE NEMOURS INC. (f/k/a )**

*DOWDUPONT, INC.) (“DOWDUPONT”), )*

Serve: )

Registered Agent )

CT Corporation System )

120 South Central Avenue )

Clayton, Missouri, 63105 )

**and )**

**LEO M. ELLEBRACHT COMPANY,** )  
(sued individually and as successor in- )  
interest-to **ELLEBRACHT FIRE** )  
**APPARATUS SERVICE, INC.,**)

Serve: )

Registered Agent )  
Lloyd A. Dewald )  
104 Mullach Ct., Suite 1028 )  
Wentzville, Missouri 63385 )

**and** )

**NATIONAL FOAM, INC.** )

Serve: )

Registered Agent )  
The Corporation Trust Company )  
1209 Orange Street )  
Wilmington, Delaware 19801 )

**and** )

**RAYTHEON TECHNOLOGIES** )  
**CORPORATION,** (sued individually and as )  
successor in-interest-to United Technologies )  
Corporation) )

Serve: )

CT Corporation System )  
120 South Central Ave. )  
Clayton, MO 63105 )

**and** )

**SENTINEL EMERGENCY** )  
**SOLUTIONS, LLC,** (*sued individually and* )  
*as successor in-interest-to* **BATTALION** )  
**THREE, INC., and FRANCO FIRE** )  
**EQUIPMENT** )

Serve: )

Registered Agent )  
Charles A. Hurth, III )  
301 E. Main St. )  
Union, Missouri 63084 )

**and** )

**THE CHEMOURS COMPANY FC, LLC,** )  
 Serve: )  
     Registered Agent )  
     CT Corporation System )  
     120 South Central Avenue )  
     Clayton, Missouri, 63105 )

**and** )

**TYCO FIRE PRODUCTS L.P.,** (*sued* )  
*individually and as successor-in-interest to* )  
**THE ANSUL COMPANY)** )  
 Serve: )  
     Registered Agent )  
     CT Corporation System )  
     120 South Central Avenue )  
     Clayton, Missouri, 63105 )

**and** )

**UTC FIRE & SECURITY AMERICAS** )  
**CORPORATION, INC.** )  
 Serve: )  
     Registered Agent )  
     CT Corporation System )  
     120 South Central Avenue )  
     Clayton, Missouri, 63105 )

**and**

**JOHN DOE DEFENDANTS 1-20**  
**Defendants.**

### **PETITION**

COMES NOW Plaintiff TINA POYNTER-ABELL as Plaintiff *Ad Litem*, and as Representative for all persons identified by § 537.080 R.S.Mo, and as the surviving Spouse of Robert Abell, for her claims and causes of action against the Defendants, state and allege for their claims and causes of action against the Defendants, upon information and belief, states:

### **PARTIES**

**A. PLAINTIFF AND DECEDENT**

1. Plaintiff Tina Poynter-Abell is a resident of the State of Missouri residing in St. Louis, Missouri. Plaintiff Tina Poynter-Abell was Decedent Robert Abell's wife and a Class I Beneficiary entitled to bring this action against Defendants for the wrongful death of Robert Abell.

2. Decedent Robert Abell was a resident of the State of Missouri residing in St. Louis, Missouri. Decedent worked as a firefighter for many years, including all or portions of the year 1991 and continuously thereafter until the end of 2016.

3. For the entirety of this time, Mr. Abell's service as a Firefighter was for and in the City of St. Louis, Missouri.

4. Decedent was diagnosed with diffuse large B-cell Central Nervous System Lymphoma (hereinafter Non-Hodgkin's Lymphoma or "NHL") and subsequently died on September 24, 2017.

5. Plaintiff brings this action pursuant to § 537.080 R.S.Mo. Plaintiff is a member of the class of individuals authorized to pursue a wrongful death claim.

**B. DEFENDANTS**

6. Defendant, 3M Company, f/k/a Minnesota Mining and Manufacturing Company, ("3M"), is a Delaware corporation and does business throughout the United States. 3M has its principal place of business at 3M Center, St. Paul, Minnesota 55133.

7. 3M designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Petition.

8. Defendant Buckeye Fire Equipment Company ("Buckeye") is an Ohio corporation and does business throughout the United States. Buckeye has its principal place of business at 110



Kings Road, Mountain, North Carolina 28086.

9. Buckeye designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint.

10. Defendant Chemguard, Inc. (“Chemguard”) is a Wisconsin corporation and does business throughout the United States. Chemguard has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143.

11. Chemguard designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Petition.

12. Defendant Chubb Fire, Ltd. is a foreign private limited company, with offices at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Upon information and belief, Chubb is registered in the United Kingdom with a registered number of 134210. Upon information and belief, Chubb is or has been composed of different subsidiaries and/or divisions, including but not limited to, Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc. Defendant Chubb Fire, Ltd. Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc. are referred to collectively as (“Chubb”).

13. Defendant Chubb is a corporation doing business in several U.S. states, including Missouri, with its principal place of business and headquarters located at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Defendant Chubb may be served with process at its

headquarters through an international service company. The United States and the United Kingdom are both parties to the Hague Convention on the Service Abroad of Judicial and Extra-Judicial Documents in Civil or Commercial Matters, TIS#10072 (U.S. Treaties and other International Acts) and 20 UST 361 (U.S. Treaties and other International Agreements). Service in accordance with this international treaty is an acceptable method for serving documents in the United Kingdom.

14. Defendant Corteva, Inc. (“Corteva”) is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is 974 Center Rd, Wilmington, Delaware 19805.

15. Corteva designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

16. Defendant Du Pont de Nemours Inc. (f/k/a DowDuPont, Inc.) (“DowDuPont”), is a Delaware corporation and does business throughout the United States. DowDuPont, has its principal place of business at 974 Centre Road, Wilmington, Delaware 19805 and 2211 H.H. Dow Way, Midland, Michigan 48674.

17. DowDuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

18. Defendant Dynax Corporation (“Dynax”) is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is 103 Fairview Park Drive, Elmsford, New York, 10523-1544.

19. Dynax designed, marketed, developed, manufactured, distributed, released, trained

users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

20. Defendant E. I. du Pont de Nemours and Company (“DuPont”), is a Delaware corporation and does business throughout the United States. DuPont has its principal place of business at 1007 Market Street, Wilmington, Delaware 19898.

21. DuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

22. The Leo M. Ellebracht Company, sued individually and as successor in interest to Ellebracht Fire Apparatus Service, Inc., is a Missouri Corporation with its principle place of business located at 104 Mullach Ct., Ste. 1028, Wentzville, Missouri, 63385, United States, it can be served at its Registered Agent: Lloyd A. Dewald, 104 Mullach Ct., Suite 1028, Wentzville, Missouri, 63385, United States.

23. At all times relevant hereto, the Leo M. Ellebracht Company and or its predecessors in interest were an authorized dealer of one or more of the aqueous film-forming foams (“AFFF”) product(s) more fully below, and Leo M. Ellebracht Company, and its predecessors in interest in fact did sell, deliver or cause to be delivered, and advertised, marketed by mailing, telephone, direct and in-person contacts, and specifically engaged in this conduct with the City of St. Louis Fire Department, and its authorized agents and employees, and did in fact provide “samples” or exemplar AFFF products, specifically and personally demonstrated the usage, efficacy, storage, and other related aspects of the AFFF to the St. Louis Fire Department (the “Department”) during the time in which Decedent Robert Abell was employed by the Department as a Firefighter and during the time in which he was using and exposed to such AFFF products, and provided information

concerning the proper and “safe” use and handling of such products.

24. Defendant National Foam, Inc. (“National Foam”) is a Delaware corporation and does business throughout the United States. National Foam has its principal place of business at 350 East Union Street, West Chester, Pennsylvania 19382.

25. National Foam designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition.

26. Defendant Raytheon Technologies Corporation, sued individually and as successor in-interest-to United Technologies Corporation is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. United Technologies has its principal place of business at 8 Farm Springs Road, Farmington, Connecticut 06032.

27. Defendant Raytheon Technologies Corporation, sued individually and as successor in-interest-to United Technologies Corporation, and United Technologies designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

28. At all times relevant hereto, Sentinel Emergency Solutions, LLC, (sued individually and as successor in-interest-to Battalion Three, Inc., And Franco Fire Equipment) was a Missouri Corporation with its principal place of business in the State of Missouri, and can be served at its Registered Agent at: Charles A. Hurth, III 301 E. Main St., Union, Missouri 63084.

29. At all times relevant hereto, Sentinel Emergency Solutions, LLC, and or its

predecessors in interest were an authorized dealer of one or more of the aqueous film-forming foams (“AFFF”) product(s) more fully below, and Sentinel, and its predecessors in interest in fact did sell, deliver or cause to be delivered, and advertised, marketed by mailing, telephone, direct and in-person contacts, and specifically engaged in this conduct with the City of St. Louis Fire Department, and its authorized agents and employees, and did in fact provide “samples” or exemplar AFFF products, specifically and personally demonstrated the usage, efficacy, storage, and other related aspects of the AFFF to the St. Louis Fire Department (the “Department”) during the time in which Decedent Robert Abell was employed by the Department as a Firefighter and during the time in which he was using and exposed to such AFFF products, and provided information concerning the proper and “safe” use and handling of such products.

30. Defendant The Chemours Company FC, LLC (“Chemours FC”), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business 1007 Market Street, Wilmington, Delaware 19898.

31. Chemours FC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

32. Defendant Tyco Fire Products, LP, as successor-in-interest to The Ansul Company (“Tyco”), is a Delaware limited partnership and does business throughout the United States. Tyco has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143. Tyco manufactured and currently manufactures the Ansul brand of products, including Ansul brand AFFF containing PFAS.

33. Tyco is the successor in interest to the corporation formerly known as The Ansul Company (“Ansul”). At all times relevant, Tyco/Ansul designed, marketed, developed,

manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition.

34. Defendant UTC Fire & Security Americas Corporation, Inc. (f/k/a GE Interlogix, Inc.) ("UTC") is a North Carolina corporation and does business throughout the United States. UTC has principal place of business at 3211 Progress Drive, Lincolnton, North Carolina 28092. Upon information and belief, Kidde-Fenwal, Inc. is part of the UTC Climate Control & Security unit of United Technologies Corporation.

35. UTC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint.

36. Defendants John Does 1-20 all designed, marketed, developed, manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition that caused and/or contributed to the injuries alleged below, the identities of which are currently unknown to Plaintiffs.

#### **AGENCY**

37. At all relevant times, Defendants were acting by and through their actual and/or ostensible employees and agents. Whenever reference in this Petition is made to any act or transaction by Defendants such allegation shall be deemed to mean that the principals, officers, directors, employees, agents and/or representatives of such Defendants committed, knew of, performed, authorized, ratified and/or directed such act or transaction on behalf of such Defendants while actively engaged in the scope of their duties.

### **JURISDICTION AND VENUE**

38. This Court has subject matter jurisdiction pursuant to R.S.Mo § 506.500 because the tortious acts upon which Plaintiff's claims are based occurred within the State of Missouri, and because Plaintiff is a Missouri resident and certain defendants, as alleged above were, at all times relevant hereto, Missouri corporations.

39. Defendants Leo M. Ellebracht Company and Sentinel are Missouri corporations and therefore citizens of the State of Missouri. Because Plaintiff is a citizen of the State of Missouri complete diversity does not exist in this matter and this case cannot be properly removed to federal court.

40. Additionally, all Defendants named herein have routine and systematic business conducted in the State of Missouri and are subject to Missouri's long arm statutes, R.S.MO. §506.500. Moreover, the non-resident defendants have sufficient minimum contacts with this State by conducting substantial business in the State of Missouri, marketing and selling their products for profit in the State of Missouri, and directing their activities toward the residents of the State of Missouri. Each Defendant is also subject to personal and subject matter jurisdiction in the State of Missouri because of Decedent Robert Abell sustaining personal injuries resulting in his wrongful death in this State.

41. The damages sought by Plaintiffs, exclusive of interests and costs, exceed the minimum jurisdictional limits of the Court.

42. Venue is proper in this Court pursuant to R.S.Mo § 508.010 because Plaintiff's causes of action accrued in the City of St. Louis, St. Louis County, Missouri.

### **ALLEGATIONS COMMON TO ALL COUNTS**

43. Plaintiff brings this action for damages for the wrongful death of Robert Abell

resulting from exposure to aqueous film-forming foams (“AFFF”) containing the toxic chemicals collectively known as per and polyfluoroalkyl substances (“PFAS”). PFAS includes, but is not limited to, perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonic acid (“PFOS”) and related chemicals including those that degrade to PFOA and/or PFOS.

44. Aqueous Film-Forming Foam (“AFFF”) is a combination of chemicals used to extinguish hydrocarbon fuel-based fires.

42. AFFF-containing fluorinated surfactants have better firefighting capabilities than water due to their surfactant-tension lowering properties which allow the compound(s) to extinguish fire by smothering, ultimately starving it of oxygen.

43. AFFF is a Class-B firefighting foam. It is mixed with water and used to extinguish fires that are difficult to fight, particularly those that involve petroleum or other flammable liquids.

44. Defendants designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise handled AFFF containing toxic PFAS that were used by entities around the country, including military, county, and municipal firefighting departments.

45. Defendants have each designed, marketed, developed, manufactured, distributed, released, trained users on, produced instructional materials for, sold, and/or otherwise handled and/or used AFFF containing PFAS, in such a way as to cause the contamination of Plaintiff’s blood and/or body with PFAS, and the resultant biopersistence and bioaccumulation of such PFAS in the blood and/or body of Plaintiff.

46. AFFF was introduced commercially in the mid-1960s and rapidly became the primary firefighting foam in the United States and in other parts of the world. It contains PFAS,



which are highly fluorinated synthetic chemical compounds whose family include PFOS and PFOA.

47. PFAS are a family of chemical compounds containing fluorine and carbon atoms.

48. PFAS have been used for decades in the manufacture of AFFF. The PFAS family of chemicals are entirely human-made and do not naturally occur or otherwise exist.

49. Prior to commercial development and large-scale manufacture and use of AFFF containing PFAS, no such PFAS had been found or detected in human blood.

**A. AFFF / PFAS HAZARDOUS EFFECTS ON HUMANS**

50. AFFF and its components are associated with a wide variety of adverse health effects in humans.

51. Exposure to Defendants' AFFF has been linked to serious medical conditions including, but not limited to, kidney cancer, testicular cancer, testicular tumors, pancreatic cancer, prostate cancer, leukemia, lymphoma, bladder cancer, thyroid disease and infertility.

52. By at least the end of the 1960s, animal toxicity testing performed by Defendants manufacturing and/or using PFAS indicated that exposure to such materials, including at least PFOA, resulted in various adverse health effects among multiple species of laboratory animals, including toxic effects to the liver, testes, adrenals, and other organs and bodily systems.

53. By at least the end of the 1960s, additional research and testing performed by Defendants manufacturing and/or using PFAS indicated that such materials, including at least PFOA, because of their unique chemical structure, were resistant to environmental degradation and would persist in the environment essentially unaltered if allowed to enter the environment.

54. By at least the end of the 1970s, additional research and testing performed by Defendants manufacturing and/or using PFAS indicated that one or more such materials,

including at least PFOA and PFOS, because of their unique chemical structure, would bind to proteins in the blood of animals and humans exposed to such materials where such materials would remain and persist over long periods of time and would accumulate in the blood/body of the exposed individuals with each additional exposure.

55. By at least the end of the 1980s, additional research and testing performed by Defendants manufacturing and/or using PFAS indicated that at least one such PFAS, PFOA, had caused Leydig cell (testicular) tumors in a chronic cancer study in rats, resulting in at least one such Defendant, DuPont, classifying such PFAS internally as a confirmed animal carcinogen and possible human carcinogen.

56. It was understood by Defendants by at least the end of the 1980s that a chemical that caused cancer in animal studies must be presumed to present a cancer risk to humans, unless the precise mechanism of action by which the tumors were caused was known and would not occur in humans.

57. By at least the end of the 1980s, scientists had not determined the precise mechanism of action by which any PFAS caused tumors. Therefore, scientific principles of carcinogenesis classification mandated Defendants presume any such PFAS material that caused tumors in animal studies could present a potential cancer risk to exposed humans.

58. By at least the end of the 1980s, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least DuPont, indicated that elevated incidence of certain cancers and other adverse health effects, including elevated liver enzymes and birth defects, had been observed among workers exposed to such materials, including at least PFOA, but such data was not published, provided to governmental entities as required by law, or otherwise publicly disclosed at the time.

59. By at least the end of the 1980s, Defendants, including at least 3M and DuPont, understood that, not only did PFAS, including at least PFOA and PFOS, get into and persist and accumulate in the human blood and in the human body, but that once in the human body and blood, particularly the longer-chain PFAS, such as PFOS and PFOA, had a long half-life. Meaning that it would take a very long time before even half of the material would start to be eliminated, which allowed increasing levels of the chemicals to build up and accumulate in the blood and/or body of exposed individuals over time, particularly if any level of exposure continued.

60. By at least the end of the 1990s, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, indicated that at least one such PFAS, PFOA, had caused a triad of tumors (Leydig cell (testicular), liver, and pancreatic) in a second chronic cancer study in rats.

61. By at least the end of the 1990s, the precise mechanism(s) of action by which any PFAS caused each of the tumors found in animal studies had still not been identified, mandating that Defendants continue to presume that any such PFAS that caused such tumors in animal studies could present a potential cancer risk to exposed humans.

62. By at least 2010, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, revealed multiple potential adverse health impacts among workers exposed to such PFAS, including at least PFOA, such as increased cancer incidence, hormone changes, lipid changes, and thyroid and liver impacts.

63. When the United States Environmental Protection Agency (“USEPA”) and other state and local public health agencies and officials first began learning of PFAS exposure in the United States and potential associated adverse health effects, Defendants repeatedly assured and

represented to such entities and the public that such exposure presented no risk of harm and were of no significance.

64. After the USEPA and other entities began asking Defendants to stop manufacturing and/or using certain PFAS, Defendants began manufacturing and/or using and/or began making and/or using more of certain other and/or “new” PFAS, including PFAS materials with six or fewer carbons, such as GenX (collectively “Short-Chain PFAS”).

65. Defendants manufacturing and/or using Short-Chain PFAS, including at least DuPont and 3M, are aware that one or more such Short-Chain PFAS materials also have been found in human blood.

66. By at least the mid-2010s, Defendants, including at least DuPont and Chemours, were aware that at least one Short-Chain PFAS had been found to cause the same triad of tumors (Leydig (testicular), liver, and pancreatic) in a chronic rat cancer study as had been found in a chronic rat cancer study with a non-Short-Chain PFAS.

67. Research and testing performed by and/or on behalf of Defendants making and/or using Short-Chain PFAS indicates that such Short-Chain PFAS materials present the same, similar, and/or additional risks to human health as had been found in research on other PFAS materials, including cancer risk.

68. Nevertheless, Defendants repeatedly assured and represented to governmental entities and the public (and continue to do so) that the presence of PFAS, including Short-Chain PFAS, in human blood at the levels found within the United States present no risk of harm and is of no legal, toxicological, or medical significance of any kind.

69. At all relevant times, Defendants, individually and/or collectively, possessed the resources and ability but have intentionally, purposefully, recklessly, and/or negligently chosen

not to fund or sponsor any study, investigation, testing, and/or other research of any kind of the nature that Defendants claim is necessary to confirm and/or prove that the presence of any one and/or combination of PFAS in human blood causes any disease and/or adverse health impact of any kind in humans, presents any risk of harm to humans, and/or is of any legal, toxicological, or medical significance to humans, according to standards Defendants deem acceptable.

70. Even after an independent science panel, known as the “C8 Science Panel,” publicly announced in the 2010s that human exposure to 0.05 parts per billion or more of one PFAS, PFOA, had “probable links” with certain human diseases, including kidney cancer, testicular cancer, ulcerative colitis, thyroid disease, preeclampsia, and medically-diagnosed high cholesterol, Defendants repeatedly assured and represented to governmental entities, their customers, and the public (and continue to do so) that the presence of PFAS in human blood at the levels found within the United States presents no risk of harm and is of no legal, toxicological, or medical significance of any kind, and have represented to and assured such governmental entities, their customers, and the public (and continue to do so) that the work of the independent C8 Science Panel was inadequate.

71. At all relevant times, Defendants shared and/or should have shared among themselves all relevant information relating to the presence, biopersistence, and bioaccumulation of PFAS in human blood and associated toxicological, epidemiological, and/or other adverse effects and/or risks.

72. As of the present date, blood serum testing and analysis by Defendants, independent scientific researchers, and/or government entities has confirmed that PFAS materials are clinically demonstrably present in approximately 99% of the current population of the United States.

73. There is no naturally-occurring “background,” normal, and/or acceptable level or rate of any PFAS in human blood, as all PFAS detected and/or present in human blood is present and/or detectable in such blood as a direct and proximate result of the acts and/or omissions of Defendants.

74. At all relevant times, Defendants, through their acts and/or omissions, controlled, minimized, trivialized, manipulated, and/or otherwise influenced the information that was published in peer-review journals, released by any governmental entity, and/or otherwise made available to the public relating to PFAS in human blood and any alleged adverse impacts and/or risks associated therewith, effectively preventing Plaintiff from discovering the existence and extent of any injuries/harm as alleged herein.

75. At all relevant times, Defendants, through their acts and/or omissions, took steps to attack, challenge, discredit, and/or otherwise undermine any scientific studies, findings, statements, and/or other information that proposed, alleged, suggested, or even implied any potential adverse health effects or risks and/or any other fact of any legal, toxicological, or medical significance associated with the presence of PFAS in human blood.

76. At all relevant times, Defendants, through their acts and/or omissions, concealed and/or withheld information from their customers, governmental entities, and the public that would have properly and fully alerted Plaintiff to the legal, toxicological, medical, or other significance and/or risk from having any PFAS material in Plaintiff’s blood.

77. At all relevant times, Defendants encouraged the continued and even further increased use of PFAS by their customers and others, including but not limited to the manufacture, use, and release, of AFFF containing PFAS and/or emergency responder protection gear or equipment coated with materials made with or containing PFAS, and tried to encourage

and foster the increased and further use of PFAS in connection with as many products/uses/and applications as possible, despite knowledge of the toxicity, persistence, and bioaccumulation concerns associated with such activities.

78. To this day, Defendants deny that the presence of any PFAS in human blood, at any level, is an injury or presents any harm or risk of harm of any kind, or is otherwise of any legal, toxicological, or medical significance.

79. To this day, Defendants deny that any scientific study, research, testing, or other work of any kind has been performed that is sufficient to suggest to the public that the presence of any PFAS material in human blood, at any level, is of any legal, toxicological, medical, or other significance.

80. Defendants, to this day, affirmatively assert and represent to governmental entities, their customers, and the public that there is no evidence that any of the PFAS found in human blood across the United States causes any health impacts or is sufficient to generate an increased risk of future disease sufficient to warrant diagnostic medical testing, often referring to existing studies or data as including too few participants or too few cases or incidents of disease to draw any scientifically credible or statistically significant conclusions.

81. Defendants were and/or should have been aware, knew and/or should have known and/or foresaw or should have foreseen that their design, marketing, development, manufacture, distribution, release, training and response of users, production of instructional materials, sale and/or other handling and/or use of AFFF containing PFAS would result in the contamination of the blood and/or body of Plaintiff with PFAS, and the biopersistence and bioaccumulation of such PFAS in his blood and/or body.

82. Defendants were and /or should have been aware, or knew and/or should have

known, and/or foresaw or should have foreseen that allowing PFAS to contaminate the blood and/or body of Plaintiff would cause injury, irreparable harm, and/or unacceptable risk of such injury and/or irreparable harm to Plaintiff.

83. Defendants did not seek or obtain permission or consent from Plaintiff before engaging in such acts and/or omissions that caused, allowed, and/or otherwise resulted in Plaintiff's exposure to AFFF and the contamination of Plaintiff's blood and/or body with PFAS materials, and resulting biopersistence and bioaccumulation of such PFAS in his blood and/or body.

**B. DEFENDANTS' HISTORY OF MANUFACTURING AND SELLING AFFF**

84. 3M began producing PFOS and PFOA by electrochemical fluorination in the 1940s. In the 1960s, 3M used its fluorination process to develop AFFF.

85. 3M manufactured, marketed, and sold AFFF from the 1960s to the early 2000s.

86. National Foam and Tyco/Ansul began to manufacture, market, and sell AFFF in the 1970s.

87. Buckeye began to manufacture, market, and sell AFFF in the 2000s.

88. In 2000, 3M announced it was phasing out its manufacture of PFOS, PFOA, and related products, including AFFF. 3M, in its press release announcing the phase out, stated "our products are safe," and that 3M's decision was "based on [its] principles of responsible environment management." 3M further stated that "the presence of these materials at [] very low levels does not pose a human health or environmental risk." In communications with the EPA at that time, 3M also stated that it had "concluded that...other business opportunities were more deserving of the company's energies and attention..."



89. Following 3M's exit from the AFFF market, the remaining Defendants continued to manufacture and sell AFFF that contained PFAS and/or its precursors.

90. Defendants knew their customers warehoused large stockpiles of AFFF. In fact, Defendants marketed their AFFF products by touting its shelf-life. Even after Defendants fully understood the toxicity of PFAS, and their impacts to the health of humans following exposure, Defendants concealed the true nature of PFAS. While Defendants phased out production or transitioned to other formulas, they did not instruct their customers that they should not use AFFF that contained PFAS and/or their precursors. Defendants further did not act to get their harmful products off the market.

91. Defendants did not warn public entities, firefighter trainees who they knew would foreseeably come into contact with their AFFF products, or firefighters employed by either civilian and/or military employers that use of and/or exposure to Defendants' AFFF products containing PFAS and/or its precursors would pose a danger to human health

92. The Plaintiff directly used, was exposed, and/or was given AFFF to help fight fires on a regular basis.

93. The Plaintiff was never informed that this product was inherently dangerous. Nor was the Plaintiff warned about the known health risks associated with this product.

94. The Plaintiff never received or was told to use any protective gear to guard against the known dangerous propensities of this product.

95. Defendants have known of the health hazards associated with AFFF and/or its compounds for decades and that in their intended and/or common use would harm human health.

96. Information regarding AFFF and its compounds were readily accessible to each of the above-referenced Defendants for decades because each is an expert in the field of AFFF

manufacturing and/or the materials needed to manufacture AFFF, and each has detailed information and understanding about the chemical compounds that form AFFF products.

97. The AFFF Defendants' manufacture, distribution and/or sale of AFFF resulted in the Plaintiff and other individuals who came in contact with the chemical to develop cancer.

98. The AFFF Defendants through their manufacturing, distribution and/or sale of AFFF, and through their involvement and/or participation in the creation of training and instructional materials and activities, knew, foresaw, and/or should have known and/or foreseen that the Plaintiff and those similarly situated would be harmed.

99. The AFFF Defendants' products were unreasonably dangerous and the Defendants failed to warn of this danger.

#### **PLAINTIFF AND DECEDENT'S INJURIES AND DAMAGES**

100. As a direct and proximate result of Defendants' actions and failures to act, the deceased, Robert Abell, developed Non-Hodgkin's Lymphoma and died therefrom on September 24, 2017.

101. By virtue of Mr. Abell's untimely death, Plaintiff is lawfully entitled to such damages as are fair and just for the death and loss thus occasioned, including, but not limited to, the pecuniary losses suffered by reason of the death, funeral expenses, and the reasonable value of the services, consortium, companionship, comfort, instruction, guidance, counsel, training, and support of which Plaintiff has been deprived by reason of such death, further including past and future lost income, household services, and other value of benefits which would have been provided by the deceased.

102. Plaintiff further claims such damages as the deceased Robert Abell suffered between the time of injury and the time of his death and for the recovery of which the deceased

might have maintained an action had death not ensued including, but not limited to, mental anguish, physical disability, conscious pain and suffering, terror, and further considering the aggravating circumstances attendant upon the fatal injury.

103. Plaintiff Tina Poynter-Abell was the wife of Decedent Robert Abell and asserts a loss of consortium claim, as to compensate her fairly for the reasonable value of any loss of the services, society, companionship, and marriage relationship of her husband proximately caused by the fault of Defendants.

104. Plaintiff further claims punitive and exemplary damages to include, but are not limited to, the wanton, willful, callous, reckless, and depraved conduct of Defendants which entitle Plaintiff to punitive damages to punish the Defendants and to deter future wrongdoing in that the acts and omissions of Defendants have manifested such reckless and complete indifference to and conscious disregard for the safety of the public that the Decedent would have been entitled to punitive damages had he lived.

**COUNT 1**  
**Strict Liability – Design Defect**  
**(Plaintiff v. All Defendants)**

105. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein.

106. The Defendants were engaged in designing, manufacturing, marketing, selling, and distribution of AFFF.

107. When Robert Abell was exposed to the Defendants' AFFF products during the course of his employment, the AFFF was being used for the combatting of fires and training protocols, and other related uses as reasonably anticipated and directed by Defendants. Use of AFFF products in this way is a reasonably anticipated use of this product.

108. At the time of the distribution, sale and/or use of the Defendants' AFFF, said AFFF was in a defective condition and unreasonably dangerous when put to the use anticipated by Defendant, as a result of, among other things, the AFFF having the propensity to cause illnesses as enumerated more specifically above, including specifically NHL and death therefrom.

109. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause the death of Robert Abell.

110. The unreasonably dangerous and defective condition of the Defendants AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Prior to his death, Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and incurred medical expenses for medical treatment, medication and medical devices.

111. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe degeneration of his bones due to the long-term, chronic use of steroid medication to treat his respiratory condition.

112. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop diabetes and complications from diabetes due to the long-term, chronic use of steroid medication to treat his respiratory condition.

113. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

114. At the time of Defendants' distribution, sale and/or use of AFFF, they knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct which caused this damage and death of Robert Abell was willful, wanton, and/or in reckless disregard for the rights of Plaintiff and others and damages for aggravating circumstances should be assessed against Defendant.

115. As a direct and proximate result of one or more of Defendants' acts or omissions, Plaintiff and Decedent were injured and suffered damages.

116. The conduct of Defendants as alleged herein was willful, wanton and/or in reckless disregard for the rights of Plaintiff and punitive and exemplary damages should be assessed against Defendants.

WHEREFORE, Plaintiff prays judgment against Defendants for actual damages sustained as a result of the injury to Plaintiff and Decedent, for an award of punitive damages and/or damages for aggravating circumstances; together with interest and costs of this action, and for such further relief as the Court deems fair and reasonable.

**COUNT II**  
**Strict Liability in Tort -- Failure to Warn**

117. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein

118. Defendant processed, distributed, marketed, sold and supplied AFFF, without adequate instructions on safe use to reduce and/or eliminate exposure thereto, and/or without warnings that the AFFF was dangerous to health and life and caused severe respiratory diseases.

119. As a result of Defendants' failure to adequately instruct and warn of the dangerous characteristics of AFFF, the AFFF was defective and unreasonably dangerous when put to the use reasonably anticipated by Defendants.

120. The failure to adequately instruct and warn of the dangerous and defective condition of the Defendants' AFFF caused or contributed to cause the death of Robert Abell.

121. The failure to adequately instruct and warn of the dangerous and defective condition of the Defendants' AFFF caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Prior to his death, Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and incurred medical expenses for medical treatment, medication and medical devices.

122. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

123. At the time of Defendants' distribution, sale and/or use of AFFF, it knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct which caused this damage and death of Robert Abell was willful, wanton, and/or in reckless disregard for the rights of Plaintiff and others and damages for aggravating circumstances should be assessed against Defendant.

124. The dangerous and defective condition of the Defendants' product, and the Defendants' failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe, permanent, and progressive damage to the lungs, severe damage to the respiratory system, and/or impairment of the ability to function resulting in his death. Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and had to expend money for medical treatment, medication and medical devices. Plaintiff, and others entitled to recover for the

wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

125. At the time of the processing, distribution, marketing, sale, supply and/or use of AFFF, Defendant knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct, which caused this damage, was willful, wanton, and/or in reckless disregard for the rights of Plaintiffs and damages for aggravating circumstances should be assessed against Defendant.

WHEREFORE, Plaintiffs pray for judgment against the Defendants, in excess of the jurisdictional limit and as determined at trial, for actual and punitive damages and/or damages for aggravating circumstances, for the costs of this action and for such further relief as the Court deems fair and reasonable in the premises.

### **COUNT III**

#### **Negligence**

126. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein

127. As a manufacturer, processor, distributor, marketer, seller and supplier of AFFF, Defendants had a duty to exercise due care and the ordinary, reasonable and technical skill and competence that is required of processors, distributors, marketers, sellers, suppliers, and others in a similar situation, including, without limitation, the duty to acquire and maintain the knowledge of an expert, in processing, distribution, marketing, sale, and/or supply of products free from defects and/or latent defects; and the duty to adequately warn of product defects and/or hazards, which duty continued even after the sale of said products.

128. Defendants failed to use due care under the circumstances and were thereby negligent in the performance of their duties to Robert Abell and Plaintiff.

129. The negligence of Defendants caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and had to expend money for medical treatment, medication and medical devices. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

130. At the time of Defendants' manufacturing, processing, distribution, marketing, selling, and supplying of AFFF, the Defendants knew of the dangerous condition of said products and thereby showed complete indifference to and/or conscious disregard for the safety of others. Defendants' conduct, which caused this damage, was willful, wanton, and/or in reckless disregard for the rights of Plaintiffs and damages for aggravating circumstances should be assessed against the Defendant.

WHEREFORE, Plaintiff prays for judgment against Defendant, in excess of the jurisdictional limit and as determined at trial, for actual and punitive damages and/or damages for aggravating circumstances, for the costs of this action and for such further relief as the Court deems fair and reasonable in the premises.

#### **COUNT IV**

##### **Aggravating Circumstances - Punitive Damages**

131. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein.

132. Defendants committed one or more of the willful, wanton and malicious acts more fully set forth above which individually and/or cumulatively justify the submission of damages for aggravating circumstances in this case.



133. Defendants knew or had information from which, in the exercise of ordinary care, should have known that such conduct, as more fully set forth above, created a high degree of probability of severe injury, disease and death, including the disease from which Robert Abell suffered and from which he died, NHL.

134. The willful, wanton and malicious acts of Defendants, as more fully set forth above, evidence a complete indifference to and/or conscious disregard for the health and safety of Robert Abell, and others similarly situated, justifying the submission of damages for aggravating circumstances in this case.

WHEREFORE, Plaintiff prays for judgment against Defendants, and for damages for aggravating circumstances in such an amount as will serve to punish and deter Defendant, and others similarly situated, from engaging in like conduct.

**COUNT V**  
**Wrongful Death, Pursuant To R.S.M.O § 537.080**

135. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein.

136. Plaintiff makes this separate claim for the wrongful death of Decedent Robert Abell, who on September 24, 2017 died as a direct and proximate result of the actions or inactions of the Defendants as set forth above, and Plaintiff, as heretofore set out, suffered damages.

137. As a further direct and proximate result of the aforementioned conduct of the Defendants, Plaintiff was caused to incur funeral expenses, mental anguish, suffering and bereavement both prior to and subsequent to the death of the deceased; loss of companionship, comfort, protection, care, attention, advice, counsel and guidance; loss of financial support and loss of services of the deceased to Plaintiff's actual damages.

138. Defendants' conduct, which caused this damage, showed complete indifference and a conscious disregard for the health and safety of others, and constitutes aggravating circumstances leading to Decedent's death.

WHEREFORE, Plaintiff prays judgment against Defendants for actual damages sustained as a result of the injury to Plaintiff, for an award of punitive damages and/or damages for aggravating circumstances; together with interest and costs of this action, and for such further relief as the Court deems fair and reasonable.

**JURY TRIAL DEMAND**

139. Plaintiff hereby requests a trial by jury.

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

*/s/ Andrew K. Smith*

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Andrew K. Smith MO Bar #60485

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**Attorneys for Plaintiffs**

**IN THE CIRCUIT COURT IN THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

**TINA POYNTER-ABELL, AS SPOUSE** )  
**OF AND ON BEHALF OF DECEDENT** )  
**ROBERT ABELL** )  
 6328 Tholozan Ave. )  
 St. Louis, MO 63109 )

**Case No.:**

**Plaintiff,**

**Division:**

**v.**

**3M COMPANY** *f/k/a* **MINNESOTA** )  
**MINING AND MANUFACTURING** )  
 Serve: )  
     Registered Agent )  
     CSC-Lawyers Incorporating Services )  
     Company )  
     221 Bolivar Street )  
     Jefferson City, Missouri 65101 )

**and**

**BUCKEYE FIRE EQUIPMENT** )  
**COMPANY** )  
 Serve: )  
     Registered Agent )  
     A Haon Corporate Agent, Inc. )  
     29225 Chagrin Blvd., Ste. 350 )  
     Pepper Pike, OH 44122 )

**and**

**CHEMGUARD, INC.** )  
 Serve: )  
     Registered Agent )  
     CT Corporation System )  
     1999 Bryan Street, Ste. 900 )  
     Dallas, Texas 75201 )

**and**

**CHUBB FIRE, LTD./CHUBB FIRE &** )  
**SECURITY LTD./CHUBB SECURITY,** )

**PLC/RED HAWK FIRE & SECURITY, )  
LLC, and/or CHUBB NATIONAL )  
FOAM, INC. )**

**and )**

**CORTEVA, INC., )**

Serve: )

Registered Agent )

C T Corporation System )

120 South Central Avenue )

Clayton, Missouri, 63105 )

**and )**

**DU PONT DE NEMOURS INC. (f/k/a )  
DOWDUPONT INC.) )**

Serve: )

Registered Agent )

The Corporation Trust Company )

1209 Orange Street )

Wilmington, DE 19801 )

**and )**

**DYNAX CORPORATION )**

Serve: )

Registered Agent )

Corporate Systems, LLC )

3500 S. Dupont Highway )

Dover, Delaware 19901 )

**and )**

**E.I. DU PONT DE NEMOURS INC. (f/k/a )  
DOWDUPONT, INC.) (“DOWDUPONT”), )**

Serve: )

Registered Agent )

C T Corporation System )

120 South Central Avenue )

Clayton, Missouri, 63105 )

**and )**

**LEO M. ELLEBRACHT COMPANY, )  
(sued individually and as successor in- )**

interest-to ELLEBRACHT FIRE )  
APPARATUS SERVICE, INC.,) )  
Serve: )  
Registered Agent )  
Lloyd A. Dewald )  
104 Mullach Ct., Suite 1028 )  
Wentzville, Missouri 63385 )  
)  
**and** )  
)  
**NATIONAL FOAM, INC.** )  
Serve: )  
Registered Agent )  
The Corporation Trust Company )  
1209 Orange Street )  
Wilmington, Delaware 19801 )  
)  
**and** )  
)  
**RAYTHEON TECHNOLOGIES** )  
**CORPORATION,** (sued individually and as )  
successor in-interest-to United Technologies )  
Corporation) )  
Serve: )  
C T Corporation System )  
120 South Central Ave. )  
Clayton, MO 63105 )  
)  
**and** )  
)  
**SENTINEL EMERGENCY** )  
**SOLUTIONS, LLC,** (*sued individually and* )  
*as successor in-interest-to* BATTALION )  
THREE, INC., and FRANCO FIRE )  
EQUIPMENT )  
Serve: )  
Registered Agent )  
Charles A. Hurth, III )  
301 E. Main St. )  
Union, Missouri 63084 )  
)  
**and** )  
)  
)  
**THE CHEMOURS COMPANY FC, LLC,** )  
Serve: )

Registered Agent )  
 C T Corporation System )  
 120 South Central Avenue )  
 Clayton, Missouri, 63105 )

**and** )

**TYCO FIRE PRODUCTS L.P., (sued** )  
***individually and as successor-in-interest to*** )  
***THE ANSUL COMPANY*)** )

Serve: )

Registered Agent )  
 C T Corporation System )  
 120 South Central Avenue )  
 Clayton, Missouri, 63105 )

**and** )

**UTC FIRE & SECURITY AMERICAS** )  
**CORPORATION, INC.** )

Serve: )

Registered Agent )  
 C T Corporation System )  
 120 South Central Avenue )  
 Clayton, Missouri, 63105 )

**and** )

**JOHN DOE DEFENDANTS 1-20** )  
**Defendants.** )

### **MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

COMES NOW Plaintiff, by and through counsel, and pursuant to Local Rule 4.8 of City of St. Louis Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

Will Acree	PPS20-0275
Jan Adams	PPS20-0276
Roger Adams	PPS20-0277
Randy Adkins	PPS20-0225
Bobby Ali	PPS20-0278
Gregory Allen	PPS20-0279
Victor Aponte	PPS20-0280
Brandon Aschenbrenner	PPS20-0281
Julia Ascorra	PPS20-0282
Teresa Bailly	PPS20-0283
Joseph Baska	PPS20-0284
Robert Bassler	PPS20-0578
Carrington Bell	PPS20-0012
George Bell	PPS20-0286
Carlos Bialet	PPS20-0579
Dianna Blea	PPS20-0287
Richard J Blea	PPS20-0288
Robert Blixt	PPS20-0289
Brent Bohnhoff	PPS20-0014
Ann Bollino	PPS20-0291
Donnie C Briley	PPS20-0292
Kathy Broom	PPS20-0293
Kenneth Brown	PPS20-0294
Douglas S Brower	PPS20-0580
Hester Bryant	PPS20-0019
Nicholas Bull	PPS20-0020
James F Burke	PPS20-0296
Randy Burrow	PPS20-0021
Gory Burt	PPS20-0022
Maurice Burton	PPS20-0298
Steve Butcher	PPS20-0581
William Caputo	PPS20-0299
Kyle Carter	PPS20-0023
Charles Casey	PPS20-0300
George Castillo	PPS20-0301
Fidel A Cervantes	PPS20-0302
Trenia Cherry	PPS20-0303
Joyce Clemmons	PPS20-0304
John Clor	PPS20-0305
Kathleen Clor	PPS20-0306
Chad Compton	PPS20-0307
Kenneth V Condrey	PPS20-0308
Sharon R Condrey	PPS20-0309

Theodore Cordasco	PPS20-0310
Cesar Corral	PPS20-0311
George H Covert	PPS20-0312
Dennis Dahlberg	PPS20-0026
Mary Dahlberg	PPS20-0027
Patricia Dambach-Cirko	PPS20-0313
Bert Daniels, Jr.	PPS20-0028
Alterck Davenport	PPS20-0314
Richard Davis	PPS20-0029
Duane D Day	PPS20-0315
Gerald R Deadwyles	PPS20-0316
Bryce Dearborn	PPS20-0317
Robert DeLacy, Jr.	PPS20-0318
Robert E DeLacy, III	PPS20-0319
Kathleen Dnunno	PPS20-0320
Marrissa Doan	PPS20-0034
Claudia Dohn	PPS20-0321
Dale Dorning	PPS20-0322
Valentina Dorning	PPS20-0323
Catherine Drake	PPS20-0324
Alex Duaine	PPS20-0325
Roland Duff	PPS20-0326
Rochelle D Earthrise	PPS20-0327
Daniel Eberle	PPS20-0328
Shawn Edwards	PPS20-0035
Jessica Ellison	PPS20-0330
Abel Emiru	PPS20-0331
Donald C Eskra, Jr.	PPS20-0332
Leticia Estrada	PPS20-0333
David S Felter	PPS20-0334
William Ferrell	PPS20-0037
Robert Finley	PPS20-0335
Stephen Folcher	PPS20-0336
Ryan D Fortune	PPS20-0337
Chris Fowler	PPS20-0338
James Frago	PPS20-0038
John Frago	PPS20-0039
Kelsey Garrett	PPS20-0582
Thomas Garrett	PPS20-0339
Andrew Garza	PPS20-0041
Charles Gay	PPS20-0340
Richard Gerber	PPS20-0341
Louis Gerrick	PPS20-0342



Paul Gisel	PPS20-0343
Ronda Godard	PPS20-0344
Adam Golden	PPS20-0345
Bradley Gordon	PPS20-0042
Tom Gorgone	PPS20-0044
Paul O Grimes	PPS20-0348
Charles Gunning	PPS20-0046
Aloysivs Guy, Sr.	PPS20-0583
David Hahn	PPS20-0584
Eric Hahn	PPS20-0585
Stefanie Hahn	PPS20-0586
Darnell Hamilton	PPS20-0143
Kimberly Hamilton	PPS20-0351
Natalie Hawks	PPS20-0050
Larry Haynes	PPS20-0352
Douglas Hays	PPS20-0051
Grace Hazell	PPS20-0353
Richard Heimerich, Jr.	PPS20-0354
Stephen Heitz	PPS20-0052
Charles Helms	PPS20-0356
Austen Hendrickson	PPS20-0357
Jonathan Hennings	PPS20-0358
Jesse J Hernandez	PPS20-0359
Michael Hibler	PPS20-0360
Anthonio Hightower	PPS20-0361
Cherrod T Hindsman	PPS20-0362
James Hise	PPS20-0054
Gary F Hodges	PPS20-0363
Alex Holland	PPS20-0057
Leonard Horseman	PPS20-0364
Ulonda Howard	PPS20-0365
Martin Hueckel	PPS20-0366
Damion Hugher	PPS20-0367
William Humble	PPS20-0590
Mary Hurley	PPS20-0058
George Illidge	PPS20-0368
Frank James	PPS20-0369
Matthew Jankowski	PPS20-0370
Betty Johnson	PPS20-0059
Edward Johnson	PPS20-0060
James Johnson	PPS20-0061
Jordan Johnson	PPS20-0372
Justin L Johnson	PPS20-0373

Randy Johnson	PPS20-0374
Samuel Johnson	PPS20-0375
Haile Kahssu	PPS20-0376
Kenneth Kearney	PPS20-0377
Michael Keating	PPS20-0378
Christopher Keilbart	PPS20-0591
Elizabeth A Kidd	PPS20-0379
Donna Jo King	PPS20-0371
Kenneth Klewicki	PPS20-0380
George Kotsiras	PPS20-0592
Wyman Kroft	PPS20-0381
Jo Ann Lane	PPS20-0382
Linda Langville	PPS20-0593
Eric B Layton	PPS20-0383
Kristie Lewis	PPS20-0384
John D Lichtenegger	PPS20-0385
Bert Lott	PPS20-0386
Robert Lutren	PPS20-0387
Daniel Maglothin	PPS20-0069
Matthews J Manlich	PPS20-0388
Robert Manning	PPS20-0389
Deborah Martin	PPS20-0072
Michael Martin	PPS20-0073
Ryan Martin	PPS20-0193
Susie Martin	PPS20-0390
Thomas Matthews	PPS20-0391
Casey McKee	PPS20-0076
Michael McMahon	PPS20-0392
Michael Meade	PPS20-0393
Michael Meador	PPS20-0077
Kenny Medlin	PPS20-0078
Arsalan Memon	PPS20-0396
Eric Mendenhall	PPS20-0397
Jenna Mendoza	PPS20-0398
Matthew Millhollin	PPS20-0081
Carla M Monehain	PPS20-0400
Carlos Moreno	PPS20-0401
Michael S Morrison	PPS20-0402
Zachary P. Mueller	PPS20-0596
Kelly Murski	PPS20-0403
Andrew Myers	PPS20-0087
Frederick Myers	PPS20-0088
James Myers	PPS20-0089

Stephanie Myers	PPS20-0090
Paul Nardizzi	PPS20-0404
Wendy Neff	PPS20-0405
Christopher New	PPS20-0091
Jillian Newkirk	PPS20-0406
Jeremy Nicholas	PPS20-0092
Michael Noble	PPS20-0093
Michael C Nolon	PPS20-0409
Colter Norris	PPS20-0410
Dennis Norris	PPS20-0411
Kody Norris	PPS20-0412
Trinity Olson	PPS20-0413
Craig Palmer	PPS20-0414
Cynthia Paris	PPS20-0415
Douglas W Patterson	PPS20-0416
Antonio Perez	PPS20-0417
Jaron Perkins	PPS20-0418
Anha Pham	PPS20-0419
Thai Pham	PPS20-0420
Bonnie Phillippi	PPS20-0597
Gregory Piazza	PPS20-0421
Vincent A Piazza	PPS20-0422
Brian T Pierce	PPS20-0423
Timothy Pinney	PPS20-0424
Joshua Pitts	PPS20-0425
Craig Podgurski	PPS20-0598
Rocellious Pope	PPS20-0426
Nancy A Porter	PPS20-0427
Andre Powell	PPS20-0428
Benjamin Purses	PPS20-0429
Richard Ramirez	PPS20-0430
Charles Reardon	PPS20-0431
Derek L Reddick	PPS20-0432
Angela Reed	PPS20-0433
Christopher Reed	PPS20-0434
Edward Reed	PPS20-0435
Betty G Rice	PPS20-0436
Karen L Rice	PPS20-0437
Cheryl Richey	PPS20-0439
Terri Richards	PPS20-0106
Debra Rios	PPS20-0440
David M Roberts	PPS20-0206
Patricia Roberts	PPS20-0207

Jeroy Robinson	PPS20-0441
Sammie Robinson	PPS20-0108
Adrienne Rodriguez	PPS20-0442
Gabriel Rodriguez	PPS20-0443
Mateo F Rodriguez	PPS20-0444
Richard C Ross	PPS20-0445
Melissa Ruiz	PPS20-0446
Antonio Ruque	PPS20-0447
Geena Christine Rupp	PPS20-0599
Edna Russell	PPS20-0110
Lee H Russell	PPS20-0448
Mark A Russell	PPS20-0449
John Sadler	PPS20-0450
Ligno Sanchez	PPS20-0451
Virginia Saxon-Ford	PPS20-0452
Greg Schermerhorn	PPS20-0453
Brenda Schiwitz	PPS20-0111
Michael Schuller	PPS20-0454
Nathaniel Scott	PPS20-0455
Grant Selvey	PPS20-0600
Quratulain Shoukat	PPS20-0456
Jeremy Small	PPS20-0457
Monica Smith	PPS20-0458
Anthony Spada	PPS20-0459
Melissa Spencer	PPS20-0460
Jamie Stallo	PPS20-0461
Marc A Starks	PPS20-0462
Barbara Steil	PPS20-0463
Kelvin Stinyard	PPS20-0464
Randy Stone	PPS20-0117
Sonja Stone	PPS20-0118
Steven Stosur	PPS20-0465
Robert T Stover	PPS20-0006
Jeanie Straessler	PPS20-0466
Chance Strawser	PPS20-0467
David Taliaferro	PPS20-0119
Ramona Rose Talvacchio	PPS20-0468
Katherina M Tan	PPS20-0469
Berhane Tassaw	PPS20-0470
Michael Taylor	PPS20-0120
Courtney S. Thiemann	PPS20-0601
Robert Hayes Thomas	PPS20-0602

Walter Thomas	PPS20-0603
William Wyatt Thomas	PPS20-0604
Christina Tiffany	PPS20-0471
Stephen M Troutz	PPS20-0472
Clinton Turpen	PPS20-0473
Henry J Valladares Cruz	PPS20-0474
Margarita Vasquez	PPS20-0475
Robert E Vick, II	PPS20-0476
Bradley Votaw	PPS20-0477
Joseph T Wachowski	PPS20-0478
Ambiko Wallace	PPS20-0479
Vance M Warren, Sr.	PPS20-0480
Barbara West	PPS20-0481
Pamela K Wheatley	PPS20-0007
Jennifer White	PPS20-0482
Gregory Willing	PPS20-0130
Conni Wilson	PPS20-0131
Deborah A Wilson	PPS20-0484
Jerry Wilson	PPS20-0132
Mitchell Wirth	PPS20-0485
Debra Woodhouse	PPS20-0133
Jerry Wooten	PPS20-0487
Kimary Ann Zappia	PPS20-0606

as private process servers in the above-captioned matter. In support of said motion, Plaintiff states that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Dated: September 24, 2020

Respectfully Submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Andrew K. Smith

Kenneth B. McClain MO Bar #32430

Andrew K. Smith MO Bar #60485

Lauren McClain MO Bar #65016

Timothy Kingsbury MO Bar #64958

221W. Lexington, Suite 400

Independence, MO 64050

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[tjk@hfmlegal.com](mailto:tjk@hfmlegal.com)

**Attorneys for Plaintiffs**

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Plaintiff's Motion for Appointment of Private Process Server is sustained and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Judge or Circuit Clerk



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: CORTEVA, INC.

Alias:

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: E I DUPONT DE NEMOURS INC  
Alias: FKA DOWDUPONT INC, DOWPUPONT

C T CORPORATION SYSTEM  
120 SOUTH CENTRAL AVE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

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September 28, 2020

Date

Clerk

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☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

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(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

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Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: LEO M. ELLEBRACHT COMPANY  
Alias: SUCC ELLEBRACHT FIRE APPARATUS SERVICE INC

LLOYD A DEWALD, RAGT  
104 MULLACH CT SUITE 1028  
WENTZVILLE, MO 63385

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

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September 28, 2020

Date

Clerk

Further Information:

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☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

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(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Sheriff's Deputy Salary  
Supplemental Surcharge \$ 10.00  
Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: RAYTHEON TECHNOLOGIES CORPORATION  
Alias: SUCC UNITED TECHNOLOGIES CORPORATION

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

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September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).  
☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

### Summons in Civil Case

The State of Missouri to: SENTINEL EMERGENCY SOLUTIONS, LLC

Alias:

CHARLES A HURTH, III, RAGT  
301 E MAIN ST  
UNION, MO 63084

**SPECIAL PROCESS SERVER**

COURT SEAL OF



CITY OF ST LOUIS

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**September 28, 2020**

Date

Clerk

Further Information:

#### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (title).  
☐ other: \_\_\_\_\_ (name) \_\_\_\_\_ (title).  
☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

#### Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Sheriff's Deputy Salary \$ \_\_\_\_\_  
Supplemental Surcharge \$ 10.00  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: THE CHEMOURS COMPANY FC, LLC

Alias:

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

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September 28, 2020

Date

Clerk

Further Information:

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I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: TYCO FIRE PRODUCTS L.P.  
Alias: SUCC THE ANSUL COMPANY

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires:

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: UTC FIRE AND SECURITY AMERICAS CORPORATION INC

Alias:

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**AFFIDAVIT OF SERVICE**

State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.**

Received by HPS Process Service & Investigations to be served on **Dynax Corporation, c/o Corporate Systems, LLC, 3500 South Dupont Highway, Dover, DE 19901**. I, Robert DeLacy, being duly sworn, depose and say that on the 2 day of October, 2020 at 10:40a .m., executed service by delivering a true copy of the Summons for Personal Service Outside the State of Missouri (Except Attachment Action) and Petition in accordance with state statutes in the manner marked below:

(X) **REGISTERED AGENT SERVICE:** By serving Casey Pineda  
as Authorized to Accept Service for the above-named entity.

( ) **RECORDS CUSTODIAN SERVICE:** By serving \_\_\_\_\_  
as \_\_\_\_\_ for the above-named entity.

( ) **CORPORATE SERVICE:** By serving \_\_\_\_\_  
as \_\_\_\_\_ for the above-named entity.

( ) **OTHER SERVICE:** As described in the Comments below.

( ) **NON SERVICE:** For the reason detailed in the Comments below.

**COMMENTS:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 2 day  
of Oct, 2020 by the affiant who is  
personally known to me.

[Signature]  
NOTARY PUBLIC

[Signature]  
PROCESS SERVER # \_\_\_\_\_  
Appointed in accordance with State Statutes

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: 2020018883









## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: <b>REX M BURLISON</b>	Case Number: <b>2022-CC09988</b>	
Plaintiff/Petitioner: <b>TINA POYNTER-ABELL</b>	Plaintiff's/Petitioner's Attorney/Address: <b>ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051</b>	
Defendant/Respondent: <b>3M COMPANY</b>	Court Address: <b>CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101</b>	(Date File Stamp)
Nature of Suit: <b>CC Wrongful Death</b>		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

The State of Missouri to: **DYNAX CORPORATION**  
 Alias:  
**CORPORATE SYSTEMS LLC, RAGT**  
**3500 S DUPONT HIGHWAY**  
**DOVER, DE 19901**

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**September 28, 2020**

Date

Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Process Server of Kent County, Delaware (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to Casey Pineda (name) Authorized to Accept Service (title).
  - ☐ other: \_\_\_\_\_

Served at Corporate Systems, LLC, 3500 S Dupont Hwy, Dover 19901 (address)

in Kent County, Delaware (state), on 10/2/20 (date) at 10:40 am (time).

Robert DeLacy

Printed Name of Sheriff or Server

Signature of Sheriff or Server

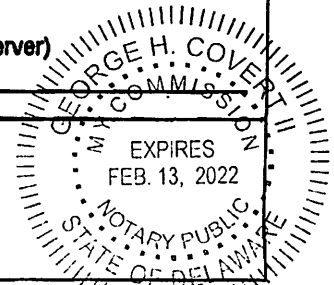
Subscribed and sworn to before me this 2 (day) Oct (month) 2020 (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title



**Service Fees**

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.





**AFFIDAVIT OF SERVICE**

State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.**

Received by HPS Process Service & Investigations to be served on **3M Company, f/k/a Minnesota Mining & Manufacturing Co., c/o CSC-Lawyers Incorporating Service Company, 221 Bolivar Street, Jefferson City, MO 65101. I, DAN M. ROBERTS**, being duly sworn, depose and say that on the 02 day of OCT, 2020 at 2:26pm., executed service by delivering a true copy of the Summons in Civil Case and Petition in accordance with state statutes in the manner marked below:

☒ **REGISTERED AGENT SERVICE:** By serving LAUREN SHIPLEY as designee for the above-named entity.

☐ **RECORDS CUSTODIAN SERVICE:** By serving \_\_\_\_\_ as \_\_\_\_\_ for the above-named entity.

☐ **CORPORATE SERVICE:** By serving \_\_\_\_\_ as \_\_\_\_\_ for the above-named entity.

☐ **OTHER SERVICE:** As described in the Comments below.

☐ **NON SERVICE:** For the reason detailed in the Comments below.

**COMMENTS:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 5<sup>th</sup> day of Oct., 2020 by the affiant who is personally known to me.

Patricia J. Roberts  
 NOTARY PUBLIC

PATRICIA J. ROBERTS  
 Notary Public-Notary Seal  
 STATE OF MISSOURI-County of Cole  
 Commission #12481691  
 My Commission Expires Dec. 4, 2020

D M ROBERTS

PROCESS SERVER # PS200202  
 Appointed in accordance with State Statutes

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: 2020018872

ST. LOUIS, MISSOURI  
OFFICE OF THE  
COMMISSIONER OF  
REVENUE  
DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102

RECEIVED  
OCT 22 2020

ST. LOUIS, MISSOURI  
OFFICE OF THE  
COMMISSIONER OF  
REVENUE  
DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102

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OFFICE OF THE  
COMMISSIONER OF  
REVENUE  
DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102

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DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102

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REVENUE  
DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102

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OFFICE OF THE  
COMMISSIONER OF  
REVENUE  
DIVISION OF TAXATION  
ST. LOUIS, MISSOURI 63102



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: 3M COMPANY

Alias: FKA MINNESOTA. MINING &amp; MANUFACTURING CO

COLE COUNTY, MO

CSC LAWYERS INC SERVICES CO

221 BOLIVAR STREET

JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: LAUREN SHIPLEY (name) Designee of Registered Agent (title).☐ other: \_\_\_\_\_Served at 221 BOLIVAR ST. JEFFERSON CITY, MO 65101 (address)in COLE (County/City of St. Louis), MO, on 10/02/20 (date) at 2:26 pm (time).DAVID M. ROBERTS

Printed Name of Sheriff or Server

DM Roberts

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 10-5-20 (date).

(Seal)

My commission expires: 12-4-20

Date

Patricia J. Roberts  
Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

PATRICIA J. ROBERTS

Notary Public-Notary Seal

STATE OF MISSOURI-County of Cole

Commission #12481691

My Commission Expires Dec. 4, 2020

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**AFFIDAVIT OF SERVICE**

State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

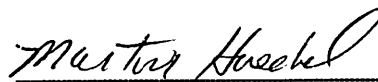
**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.****Received by HPS Process Service & Investigations to be served on Corteva, Inc. c/o CT Corporation  
System, 120 South Central Avenue, Clayton, MO 63105.****I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm,  
I:****Served the within named establishment by delivering a true copy of Summons in Civil Case; and  
Petition to Bonnie Love, POS Intake Specialist at the address of 120 South Central Avenue, Clayton,  
MO 63105.**

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 3  
day of October 2020 by the affiant who  
is personally known to me.  
NOTARY PUBLIC**SHELBY ROBERTS**  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579**MARTIN HUECKEL**  
Process Server**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: HAT-2020018873

Commission #19203276  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHELBY ROBERTS





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: CORTEVA, INC.

Alias:

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: Bonnie Cole (name) INTAKE SPEC (title).☐ other: \_\_\_\_\_Served at 120 S. Central Ave., Clayton, MO 63105 (address)in ST LOUIS (County/City of St. Louis), MO, on 10/2/2020 (date) at 2:14pm (time).Martin Heuchel

Printed Name of Sheriff or Server

Martin Heuchel

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 10/3/2020 (date).

(Seal)

My commission expires: 1/28/23  
DateShelby Roberts  
Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

SHERBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #1920323





**AFFIDAVIT OF SERVICE****State of Missouri****County of Saint Louis (City)****Circuit Court**

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.****Received by HPS Process Service & Investigations to be served on E.I. Dupont De Nemours, Inc., Alias:  
FKA Dowdupont, Inc., Dowpupont c/o CT Corporation System, 120 South Central Avenue, Clayton,  
MO 63105.****I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm,  
I:****Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with  
Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.****I am over the age of eighteen, and have no interest in the above action.**

Subscribed and Sworn to before me on the 3  
day of October 2020 by the affiant who  
is personally known to me.

Shelby Roberts  
NOTARY PUBLIC



**SHELBY ROBERTS**  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

Martin Hueckel  
**MARTIN HUECKEL**  
Process Server

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: HAT-2020018874

213809 YALEH2  
VIA COMMUNICATION  
8305 85 YEMUEL  
OF CIVIL 42  
CONFIRMATION # 17300901#





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: **E I DUPONT DE NEMOURS INC**  
Alias: FKA DOWDUPONT INC, DOWPUPONT

C T CORPORATION SYSTEM  
120 SOUTH CENTRAL AVE  
CLAYTON, MO 63105

**ST LOUIS COUNTY SHERIFF**

**COURT SEAL OF**  
  
**CITY OF ST LOUIS**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**September 28, 2020**

*Thomas Hoeyinger*  
Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:  
Bonnie Lou (name) INTAKE SPEC (title).

☐ other: \_\_\_\_\_

Served at 120 S. Central Ave, Clayton, MO 63105 (address)  
in ST LOUIS (County/City of St. Louis), MO, on 10/2/2020 (date) at 2:14pm (time).

Martin Hueckel  
Printed Name of Sheriff or Server

Martin Hueckel  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:  
Subscribed and sworn to before me on 10/3/2020 (date).

(Seal) My commission expires: 1/28/23  
Date

Shelby Roberts  
Notary Public

**Sheriff's Fees, if applicable**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ <u>10.00</u>
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**NOTARY PUBLIC**  
**NOTARY SEAL**  
**STATE OF MISSOURI**

**SHELBY ROBERTS**  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579



Commissary #1880321:  
21 FOMR COMUA  
19uneA 58' 5033  
19A Commissary Exhibits  
21ETBA ROBERTS

AFFIDAVIT OF SERVICE

State of Missouri

County of St. Louis

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:  
TINA POYNTER-ABELL

vs.

Defendant/Respondent:  
3M COMPANY, et. al.

Received by HPS Process Service & Investigations to be served on Leo M. Ellebracht Company, Alias:  
SUCC Ellebracht Fire Apparatus Service Inc. c/o Lloyd A. Dewalld, Registered Agent, 104 Mullach  
Court, Suite 1028, Wentzville, MO 63385.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 29th day of September, 2020 at 11:33  
am, I:

Served the within named establishment by delivering a true copy of Summons in Civil Case; and  
Petition to Marie Dewalld, Owner at the address of 104 Mullach Court, Suite 1028, Wentzville, MO  
63385.

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 30  
day of September 2020 by the affiant who  
is personally known to me.

NOTARY PUBLIC



SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

Martin Hueckel  
MARTIN HUECKEL  
Process Server

HPS Process Service & Investigations  
www.hpsprocess.com  
1669 Jefferson  
Kansas City, MO 64108  
(800) 796-9559

Our Job Serial Number: HAT-2020018577





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: LEO M. ELLEBRACHT COMPANY

Alias: SUCC ELLEBRACHT FIRE APPARATUS SERVICE INC

LLOYD A DEWALD, RAGT  
104 MULLACH CT SUITE 1028  
WENTZVILLE, MO 63385

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:

Marie Dewald (name) owner (title).

☐ other: \_\_\_\_\_

Served at 104 Mullach CT, Ste 1028, Wentzville, MO 63385 (address)

in ST LOUIS (County/City of St. Louis), MO, on 9/29/2020 (date) at 11:30am (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 9/29/2020 (date).

(Seal)

My commission expires: 11/28/23

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**AFFIDAVIT OF SERVICE**

State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.**

Received by HPS Process Service & Investigations to be served on **Raytheon Technologies Corporation,**  
**Alias: SUCC United Technologies Corporation c/o CT Corporation System, 120 South Central Avenue,**  
**Clayton, MO 63105.**

I, MARTIN HUECKEL, being duly sworn, depose and say that on the **1st day of October, 2020 at 2:14 pm,**  
I:

Served the within named establishment by delivering a true copy of **Summons in Civil Case; and**  
**Petition to Bonnie Love, POS Intake Specialist** at the address of **120 South Central Avenue, Clayton,**  
**MO 63105.**

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 3  
day of October 2020 by the affiant who  
is personally known to me.

Shelby Roberts  
NOTARY PUBLIC



**SHELBY ROBERTS**  
My Commission Expires  
**January 28, 2023**  
St. Louis County  
Commission #19503579

Martin Hueckel

**MARTIN HUECKEL**  
Process Server

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: HAT-2020018877

Commission #18203218  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHELBY ROBERTS







## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: RAYTHEON TECHNOLOGIES CORPORATION  
Alias: SUCC UNITED TECHNOLOGIES CORPORATION

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF  
CIRCUIT COURT OF MISSOURI  
CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Thomas Hoepfinger  
Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: Bonnie Love (name) CT TAKE SPEC (title).

☐ other: \_\_\_\_\_

Served at 120 S. Central Ave, Clayton, MO 63105 (address)  
in ST LOUIS (County/City of St. Louis), MO, on 10/1/2020 (date) at 2:14pm (time).

Martin Hueckel Printed Name of Sheriff or Server  
Martin Hueckel Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:  
Subscribed and sworn to before me on 10/2/2020 (date).

(Seal) My commission expires: 1/25/23 Date Shelby Roberts Notary Public

**Sheriff's Fees, if applicable**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

NOTARY PUBLIC  
NOTARY SEAL  
STATE OF MISSOURI

SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

Commission #16803526  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHELBY ROBERTS



AFFIDAVIT OF SERVICE

State of Missouri

County of St. Louis

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:  
**TINA POYNTER-ABELL**

vs.

Defendant/Respondent:  
**3M COMPANY, et. al.**

Received by HPS Process Service & Investigations to be served on Sentinel Emergency Solutions, LLC  
c/o Charles A. Hurth, III., Registered Agent, 301 East Main Street, Union, MO 63084.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 29th day of September, 2020 at 12:24  
pm, I:

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with  
Ashley Thornburg, Paralegal at 301 East Main Street, Union, MO 63084.


I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 30  
day of September, 2020 by the affiant who  
is personally known to me.

NOTARY PUBLIC



SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

  
MARTIN HUECKEL  
Process Server

HPS Process Service & Investigations  
www.hpsprocess.com  
1669 Jefferson  
Kansas City, MO 64108  
(800) 796-9559

Our Job Serial Number: HAT-2020018576





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: SENTINEL EMERGENCY SOLUTIONS, LLC

Alias:

CHARLES A HURTH, III, RAGT  
301 E MAIN ST  
UNION, MO 63084

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.  
☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:

Branie Love

(name)

INTAKE SPEC

(title)

☐ other: \_\_\_\_\_

Served at 120 S. Central Ave, Clayton, MO 63105 (address)

in ST LOUIS (County/City of St. Louis), MO, on 9/29/2020 (date) at 1222pm (time).

Martin Hreckel

Printed Name of Sheriff or Server

Martin Hreckel

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 9/29/2020 (date).

(Seal)

My commission expires: 1/28/23

Date

Shelby Roberts

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

**AFFIDAVIT OF SERVICE****State of Missouri****County of Saint Louis (City)****Circuit Court**

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.


Defendant/Respondent:

**3M COMPANY, et al.**

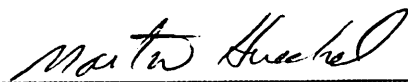
Received by HPS Process Service &amp; Investigations to be served on The Chemours Company FC, LLC c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the **1st day of October, 2020 at 2:14 pm,**  
I:Served the within named with a true copy of the **Summons in Civil Case; and Petition** by leaving with Bonnie Love, POS Intake Specialist at **120 South Central Avenue, Clayton, MO 63105.**

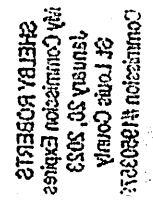
I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 3  
day of October 2020 by the affiant who  
is personally known to me.  
NOTARY PUBLICSHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

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MARTIN HUECKEL  
Process ServerHPS Process Service & Investigations  
www.hpsprocess.com  
1669 Jefferson  
Kansas City, MO 64108  
(800) 796-9559

Our Job Serial Number: HAT-2020018878







## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: THE CHEMOURS COMPANY FC, LLC  
Alias:  
CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

**ST LOUIS COUNTY SHERIFF**

**COURT SEAL OF**  
  
**CITY OF ST LOUIS**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**September 28, 2020**  
Date

*Thomas Koeppinger*  
Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: Bonnie Love (name) INTAKE SPEC. (title).

☐ other: \_\_\_\_\_

Served at 120 S. Central Ave., Clayton, MO 63105 (address)  
in ST LOUIS (County/City of St. Louis), MO, on 10/11/2020 (date) at 2:14 pm (time).

Martin Hueckel Printed Name of Sheriff or Server  
Martin Hueckel Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:  
Subscribed and sworn to before me on 10/2/2020 (date).

(Seal) My commission expires: 1/28/23 Date  
Shelby Roberts Notary Public

**Sheriff's Fees, if applicable**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579



Comptroller #1603215  
St Louis County  
FUND 58 5053  
in Comptroller Exhibit  
SHERBY ROBERTS



**AFFIDAVIT OF SERVICE**

State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.**

Received by HPS Process Service & Investigations to be served on **TYCO Fire Products, L.P., Alias:  
SUCC The Ansul Company c/o CT Corporation System, 120 South Central Avenue, Clayton, MO  
63105.**

I, **MARTIN HUECKEL**, being duly sworn, depose and say that on the **1st day of October, 2020 at 2:14 pm**,  
I:

Served the within named with a true copy of the **Summons In Civil Case; and Petition** by leaving with  
**Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.**

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 3  
day of October 2020 by the affiant who  
is personally known to me.

Shelby Roberts  
NOTARY PUBLIC



**SHELBY ROBERTS**  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

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Martin Hueckel

**MARTIN HUECKEL**  
Process Server

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: HAT-2020018880

Commission #18503276  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHELBY ROBERTS





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: TYCO FIRE PRODUCTS L.P.  
Alias: SUCC THE ANSUL COMPANY  
CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: Bonnie Love (name) INTAKE SPEC. (title).

☐ other: \_\_\_\_\_  
 Served at 120 S. Central Ave, Clayton, MO 63105 (address)  
 in ST LOUIS (County/City of St. Louis), MO, on 10/11/2020 (date) at 2:14 pm (time).

Martin Hoeckel  
 Printed Name of Sheriff or Server

Martin Hoeckel  
 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 10/12/2020 (date).

(Seal)

My commission expires: 11/28/23  
 Date

Shelby Roberts  
 Notary Public

## Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ <u>10.00</u>
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



SHELBY ROBERTS  
 My Commission Expires  
 January 28, 2023  
 St. Louis County  
 Commission #19503579

Commission #19203526  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHELBY ROBERTS



**AFFIDAVIT OF SERVICE****State of Missouri****County of Saint Louis (City)****Circuit Court**

Case Number: 2022-CC09988

Plaintiff/Petitioner:

**TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent  
ROBERT ABELL**

vs.

Defendant/Respondent:

**3M COMPANY, et al.****Received by HPS Process Service & Investigations to be served on UTC Fire and Security Americas Corporation, Inc. c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.****I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm, I:****Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.****I am over the age of eighteen, and have no interest in the above action.**

Subscribed and Sworn to before me on the 3  
day of October, 2020 by the affiant who  
is personally known to me.

Shelby Roberts  
NOTARY PUBLIC



**SHELBY ROBERTS**  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

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Martin Hueckel

**MARTIN HUECKEL**  
Process Server

**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

**Our Job Serial Number: HAT-2020018882**

Commission #1503520  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHERLY ROBERTS





## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Wrongful Death	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: UTC FIRE AND SECURITY AMERICAS CORPORATION INC

Alias:

CT CORPORATION SYSTEM, RAGT  
120 SOUTH CENTRAL AVENUE  
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with

15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:  
Bonnie Cove (name) ZUTRIE SPEC. (title).

☐ other: \_\_\_\_\_

Served at 120 S. Central Ave. Clayton, MO 63105 (address)In ST Louis (County/City of St. Louis), MO, on 10/1/2020 (date) at 2:14 pm (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 10/2/2020 (date).

(Seal)

My commission expires: 11/28/23  
Date

Shelby Roberts  
Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_



SHELBY ROBERTS  
My Commission Expires  
January 28, 2023  
St. Louis County  
Commission #19503579

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Commission #19503216  
St. Louis County  
January 28, 2023  
My Commission Expires  
SHERBY ROBERTS







## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

刑

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: BUCKEYE FIRE EQUIPMENT COMPANY

Alias:

A HAON CORPORATE AGENT INC  
29225 CHAGRIN BLVD STE 350  
PEPPER HILE, OH 44122

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

September 28, 2020

Date

Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one) ☐ the clerk of the court of which affiant is an officer.☐ the judge of the court of which affiant is an officer.☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

**Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.


**IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
vs.		
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

The State of Missouri to: **CHEMGUARD, INC.**  
Alias:  
CT CORPORATION SYSTEM, RAGT  
1999 BRYAN STREET STE 900  
DALLAS, TX 75201

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**September 28, 2020**

Date

Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).**

I am: (check one) ☐ the clerk of the court of which affiant is an officer.

☐ the judge of the court of which affiant is an officer.

☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)

☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

**Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.



# IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

## Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: CHUBB FIRE, LTD/ CHUBB FIRE & SECURITY LTD  
Alias: CHUBB SECURITY, PLC/RED HAWK FIRE & SECURITY LLC  
AND OR CHUBB NATIONAL FOAM INC

LITTLETON ROAD  
Aberdeen City  
ASHFORD, TW15 1TZ

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

September 28, 2020

Date

Clerk

Further Information:

### Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

- I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
  - ☐ the judge of the court of which affiant is an officer.
  - ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
  - ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

#### Service Fees

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_



See the following page for directions to officer making return on service of summons.

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.



# IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
vs.		
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

## Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: DU PONT DE NEMOURS, INC  
Alias: FKA DOWDUPONT INC  
THE CORPORATION TRUST COMPANY  
1209 ORANGE STREET  
WILMINGTON, DE 19801

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

September 28, 2020

Date

Further Information:

Clerk

### Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

#### Service Fees

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

**Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.




**IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

The State of Missouri to: DYNAX CORPORATION  
Alias:  
CORPORATE SYSTEMS LLC, RAGT  
3500 S DUPONT HIGHWAY  
DOVER, DE 19901

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**September 28, 2020**

Date

Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one) ☐ the clerk of the court of which affiant is an officer.

☐ the judge of the court of which affiant is an officer.

☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)

☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

**Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.


**IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
vs.		
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

The State of Missouri to: NATIONAL FOAM, INC.

Alias:

THE CORPORATION TRUST COMPANY  
1209 ORANGE STREET  
WILMINGTON, DE 19801

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**September 28, 2020**

Date

Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).**

I am: (check one) ☐ the clerk of the court of which affiant is an officer.

☐ the judge of the court of which affiant is an officer.

☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)

☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

**Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.


**IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	Special Process Server 1
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	Special Process Server 2
vs.		Special Process Server 3
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Wrongful Death		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

The State of Missouri to: **CHUBB FIRE, LIMITED/ CHUBB FIRE & SECURITY LIMITED**  
**Alias: CHUBB SECURITY, PLC/RED HAWK FIRE & SECURITY LLC**  
**AND OR CHUBB NATIONAL FOAM INC**

**CHUBB FIRE LIMITED**  
**LITTLETON ROAD**  
**ASHFORD, MIDDLESEX, ENGLAND**  
**TW15 1TZ**

**COURT SEAL OF**



**CITY OF ST LOUIS**

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**September 30, 2020**

Date

Further Information:

Clerk

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Subscribed and sworn to** before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

### Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.





Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Wrongful Death		(Date File Stamp)

### Summons in Civil Case

The State of Missouri to: 3M COMPANY

Alias: FKA MINNESOTA. MINING & MANUFACTURING CO

CSC LAWYERS INC SERVICES CO

221 BOLIVAR STREET  
JEFFERSON CITY, MO 65101

COLE COUNTY, MO

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 28, 2020

Date

Clerk

Further Information:

#### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).  
☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

#### Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Sheriff's Deputy Salary \$ 10.00  
Supplemental Surcharge \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.